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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

NIKTA JANATI,

Plaintiff,

VS.

UNIVERSITY OF NEVADA, LAS VEGAS
SCHOOL OF DENTAL MEDICINE, R.
MICHAEL SANDERS, STANLEY NELSON,
CHRISTOPHER KYPUROS, KAREN WEST,
BRANDON BIEHLER, ELENI COLLIS,
AND DOES 1-20.

Defendants.

CASE NO.: 2:15-CV-01367-APG-CWH

**STIPULATION AND ORDER TO
EXTEND SCHEDULED DEADLINES**

[First Request]

19 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
20 record, hereby stipulate and request this Court extend the unexpired Discovery Deadlines in the
21 above-captioned case for 120 days, up to and including, August 8, 2016. In support of this
22 Stipulation, the parties state as follows:

A. DISCOVERY COMPLETED TO DATE

The parties have been actively engaged in the discovery process. The following discovery has been conducted:

26 1. Plaintiff's Request for Production (First Set) on Defendant University of Nevada,
27 Las Vegas;
28 2. Plaintiff's Request for Production (First Set) on Defendant R. Michael Sanders;

- 1 3. Plaintiff's Request for Production (First Set) on Defendant Stanley Nelson;
- 2 4. Plaintiff's Request for Production (First Set) on Defendant Christopher Kypuros;
- 3 5. Plaintiff's Request for Production (First Set) on Defendant Karen West;
- 4 6. Plaintiff's Request for Production (First Set) on Defendant Brandon Biehler;
- 5 7. Plaintiff's Request for Production (First Set) on Defendant Eleni Collis;
- 6 8. Defendant University of Nevada, Las Request for Production (First Set) to Plaintiff,
- 7 Nikta Janati;
- 8 9. Plaintiff's Request for Production (Second Set) on Defendant R. Michael Sanders;
- 9 10. Plaintiff's Request for Production (Second Set) on Defendant Stanley Nelson;
- 10 11. Plaintiff's Request for Production (Second Set) on Defendant Christopher Kypuros;
- 11 12. Plaintiff's Request for Production (Second Set) on Defendant Karen West;
- 12 13. Plaintiff's Request for Production (Second Set) on Defendant Brandon Biehler;
- 13 14. Plaintiff's Request for Production (Second Set) on Defendant Eleni Collis;
- 14 15. Depositions have been taken of the following Defendants:
 - 15 a. Dr. R. Michael Sanders;
 - 16 b. Dr. Stanley Nelson;
 - 17 c. Christopher Kypuros, Ph.D.
 - 18 d. Dr. Eleni Collis; and
 - 19 e. Dr. Brandon Biehler
- 20 16. Depositions have been taken of the following percipient witnesses:
 - 21 a. Dr. Lemon;
 - 22 b. Dr. Dittmeyer;
 - 23 c. Dr. Ancajas;
 - 24 d. Dr. Davenport;
 - 25 e. Dr. Mobley; and
 - 26 f. Dr. Ingel

27 **B. DISCOVERY REMAINING TO BE COMPLETED**

28 The following discovery remains to be completed:

- 1 1. Deposition of Defendant Dr. Karen West scheduled for March 23, 2016.
- 2 2. Deposition of Plaintiff Nikta Janati for March 23, 2016.
- 3 3. Additional written discovery is anticipated to be served by both Plaintiff and
- 4 Defendants related to information obtained during the course of depositions
- 5 4. Responses are still pending for both parties' outstanding requests for production.

6 **C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES**

7 The parties have been conducting discovery in a diligent fashion. However, due to the
8 number of defendants, the number of claims, and complexity of issues, the parties will be unable to
9 complete discovery as set forth in the current Scheduling Order. A number of depositions have
10 been held identifying additional people, documents, and issues that could be relevant to this case
11 and need to be deposed and/or produced. Additionally, a number of these individuals identified no
12 longer reside in Nevada and may necessitate coordination amongst the parties. This is the parties'
13 first request for any such extension.

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1 **D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

- 2 1. The Close of Discovery should be extended to August 8, 2016.
3 2. The Interim Status Report deadline should be extended to June 9, 2016.
4 3. The Dispositive Motion deadline should be extended to September 8, 2016.
5 4. All other deadlines in this Court's Scheduling Order dated October 14, 2015 remain
6 the same.

7 DATED: MARCH 11, 2016.

8 DATED: MARCH 11, 2016.

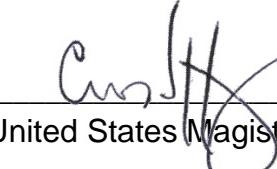
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23 **ORDER**

24 Based on a review of the parties' stipulation for extension of time (doc. # 22), IT IS
25 HEREBY ORDERED that the instant stipulation is **granted in part**. The parties shall
26 have an additional **90 days** to complete discovery in this case.

27 
28 United States Magistrate Judge